

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

SATHEESH KANNAN MARIMUTHU, et al.,)	
)	
Plaintiffs,)	Civ. No. 1:13-cv-00499-MAC-ZJH
)	
)	
v.)	DECLARATION OF
)	STEN-ERIK HOIDAL
)	
SIGNAL INTERNATIONAL LLC, et al.)	
)	
Defendants.)	

I, STEN-ERIK HOIDAL, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a shareholder at the law firm of Fredrikson & Byron P.A. and I am one of the attorneys representing Plaintiffs in the above-captioned case.

2. I submit this declaration in support of the Unopposed Motion to Amend the Scheduling Order.

3. Counsel for the plaintiffs in each of the civil actions pending against Signal International, LLC and related entities ("Signal") in the United States District Courts for the Eastern District of Louisiana and the Eastern District of Texas have reached a settlement in principle with Signal and its counsel. Counsel for plaintiffs are in the process of obtaining consents from their clients to the settlement.

4. Based on discussions with Signal's bankruptcy counsel and other similar discussions relayed to me, I understand that, due to its present financial condition, Signal intends to file for bankruptcy protection, possibly as early as July 6, 2015, which will automatically stay each of the civil actions pending against Signal. Without revealing any confidential information, it is my understanding that the settlement structure will carve out a fund in the bankruptcy to

designate payments to the plaintiffs. It is my understanding that any global settlement will ultimately need to be approved by the bankruptcy court.

5. Counsel for the plaintiffs in each of the civil actions pending against Sachin Dewan and Malvern Burnett in the United States District Courts for the Eastern District of Louisiana and the Eastern District of Texas have been engaging in settlement negotiations with Sachin Dewan and Malvern Burnett through their counsel.

6. Without revealing any confidential information, I can report that those negotiations are ongoing. Counsel for Plaintiffs is hopeful that a global settlement can be reached with Sachin Dewan and his entity as well as Malvern Burnett and his entities.

7. Settlement negotiations would be seriously disrupted if the current pretrial filing and docket call deadlines in this action is not adjourned.

8. Further, a settlement with Signal, as well as the forthcoming filing by Signal for bankruptcy protection, could significantly alter Plaintiffs' trial strategy against Burnett and Dewan. If Plaintiffs do not reach a settlement with Burnett and Dewan, additional time will be necessary to modify their trial strategy accordingly.

9. To give the Plaintiffs additional time and flexibility to finalize a settlement with Signal, as well as to negotiate a resolution of the claims against the non-Signal Defendants, the *Marimuthu* plaintiffs support an amendment of the Scheduling Order to extend the remaining deadlines, including the pretrial filing and docket call deadlines, by 60 days.

I declare that the foregoing is true and correct.

Executed this 30th day of June, 2015 in Minneapolis, Minnesota.

/s Sten-Erik Hoidal
Sten-Erik Hoidal

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